



Memorandum 15 /2005

Commonwealth of Massachusetts | Public Employee Retirement Administration Commission
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Joseph E. Connarton, *Executive Director*

MEMORANDUM

TO: All Retirement Boards

FROM: Joseph I. Martin, Deputy Executive Director

RE: Tobacco Company List

DATE: April 14, 2005

On October 22, 1997 PERAC Memo #37/1997 informed you of the adoption of Chapter 119 of the Acts of 1997. That statute prohibits retirement systems from making any new investments in stocks, securities, or other obligations of any company which derives more than 15% of its revenue from the sale of tobacco products. On December 18, 1997 PERAC sent Memo #48 regarding the implementation of Chapter 119 and the first Tobacco Company List.

Enclosed please find a Tobacco Company List dated April 1, 2005. This list replaces any other Tobacco Company List previously sent to your board and is effective upon receipt by the retirement boards. Most of these companies appeared on previous lists and such investments were prohibited from the time the companies first appeared on the list. Please forward a copy to your investment advisors or inform them that this list is available on the PERAC Home Page under the Investment Unit's 2005 Memo Index.

As part of its audit process, PERAC will assess the portfolio of each board to determine compliance. That review will determine if the board, after January 13, 1998, has purchased stock, securities, or other obligations of any company which derives more than 15% of its revenue from the sale of tobacco products. In the event a portfolio is not in compliance, the board must bring the portfolio into compliance by divesting in a prudent manner. Prior to taking any action, the board shall consult with PERAC.

In applying the statute to pooled funds, PERAC will assess the 15% rule against the entire pool as the board is purchasing shares in the pool not the individual holdings of the pool. Thus a pooled fund, if in violation of this standard, will be included on the list.

If you have any questions, please call Robert Dennis, Investment Director at 617-666-4446 ext. 922.

Enclosure

TOBACCO COMPANY LIST
April 1, 2005

COMPANY

COUNTRY

7-Eleven, Inc.	United States
Alec Bradley Cigar Corporation	United States
Altria Group, Inc.	United States
AMCON Distributing Company	United States
American Way Business Development Corporation	United States
Caribbean Cigar Company	United States
Carolina Group	United States
Delek Resources, Inc.	United States
DIMON, Inc.	United States
Evolve One, Inc.	United States
Grand Havana Enterprises, Inc.	United States
iCommerce Group Inc.	United States
Loews Corporation	United States
M&F Worldwide Corporation	United States
Niche Resources, Inc.	United States
Noble Brands, Inc.	United States
North Atlantic Trading Company	United States
Reynolds American, Inc.	United States
Schweitzer-Mauduit International, Inc.	United States
Standard Commercial Corporation	United States
Star Scientific, Inc.	United States
The Pantry, Inc.	United States
Universal Corporation	United States
UST Inc.	United States
Vector Group, Ltd.	United States
Alpha Tobacco Manufacturing Co. Ltd.	Bangladesh
British American Tobacco Bangladesh Co. Ltd.	Bangladesh
Souza Cruz SA	Brazil
Asenovgrad BT	Bulgaria
Blagoevgrad BT	Bulgaria
Bulgartabak Holding	Bulgaria
Dupnitza BT	Bulgaria
Haskovo BT	Bulgaria
Plovdiv BT	Bulgaria
Shoumen BT	Bulgaria
Sofia BT	Bulgaria

COMPANY**COUNTRY**

Rothmans, Inc.
Ultimate Direct, Inc.

Canada
Canada

Compania Chilena de Tabacos SA

Chile

Mudanjiang Hengfeng Paper Co., Ltd.
Shanghai Industrial Holdings

China
China

Compania Colombiana de Tabaco SA

Colombia

Tvornica Duhana Zagreb

Croatia

Philip Morris CR AS

Czech Republic

Skandinavisk Tobakskompagni

Denmark

Eastern Tobacco Company

Egypt

British American Tobacco (Ghana)

Ghana

Hellenic Duty Free Shops S.A.
Karelia Tobacco Co. SA
Keranis Holdings S.A.

Greece
Greece
Greece

Tabacalera Hondurena

Honduras

Godfrey Phillips India Ltd.
GTC Industries Ltd.
I.T.C. Ltd.
Kothari Products Limited
RTCL Ltd.
VST Industries Ltd.

India
India
India
India
India
India

Hanjaya Mandala Sampoerna PT
PT B.A.T. Indonesia
PT Bentoel Internasional Investama Tbk
PT Gudang Garam Tbk

Indonesia
Indonesia
Indonesia
Indonesia

Jerusalem Cigarette

Israel

Societe Ivoirienne des Tabacs

Ivory Coast

COMPANY**COUNTRY****Carreras Group Ltd.****Jamaica****Japan Tobacco Inc.****Japan****International Tobacco & Cigarette Company Ltd.
Union Tobacco****Jordan
Jordan****British American Tobacco Kenya, Ltd.****Kenya****British American Tobacco Bhd
JT International Bhd****Malaysia
Malaysia****Grupo Carso, SA de CV****Mexico****Khyber Tobacco Company Ltd.
Lakson Tobacco Company Ltd.
Pakistan Tobacco Co. Ltd.
Sarhad Cigarette Industries Ltd.****Pakistan
Pakistan
Pakistan
Pakistan****Distell Group Ltd.
Remgro Limited****South Africa
South Africa****KT&G Corporation****South Korea****Altadis SA
Compania de Distribucion Integral Logista, SA****Spain
Spain****Ceylon Tobacco Co. Ltd.****Sri Lanka****Swedish Match****Sweden****Compagnie Financiere Richemont AG****Switzerland****President Chain Store Corporation
Taiwan FamilyMart Co., Ltd.****Taiwan
Taiwan****Tanzania Cigarette Company****Tanzania****West Indian Tobacco Company Ltd.****Trinidad and Tobago**

COMPANY

**British American Tobacco, Plc
C.I. Traders Limited
Dickinson Legg Group Plc
Gallaher Group Plc
Imperial Tobacco Group Plc
Molins Plc**

British American Tobacco (Zambia) Plc

**British American Tobacco Zimbabwe Holdings
Limited**

COUNTRY

**United Kingdom
United Kingdom
United Kingdom
United Kingdom
United Kingdom
United Kingdom**

Zambia

Zimbabwe